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ABSTRACT

This is a report of a hearing on December 10, 1981, before the Subcommittee on Elementary, Secondary, and Vocational Education of the Committee on Education and Labor, House of Representatives, regarding reauthorization of the Vocational Education Act of 1963. It focuses on the vocational education data system known as VEDS. Testimony includes statements and prepared statements, letters, supplemental material, etc., from 10 individuals representing the Coast Community College District, California, and California Community and Junior Colleges Association; American Vocational Association; Office of Education Research and Improvement, United States (U.S.) Department of Education; American Association of Community and Junior Colleges; U.S. Department of Education; Cape Cod Community College; Colorado State Occupational Information Coordinating Committee; Representative in Congress from California; and Council of Chief State School Officers. (YLB)

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HEARINGS ON REAUTHORIZATION OF THE VOCATIONAL EDUCATION ACT OF 1963

Part 10: Vocational Education Data System

HEARING

BEFORE THE

SUBCOMMITTEE ON ELEMENTARY, SECONDARY, AND VOCATIONAL EDUCATION

OF THE

COMMITTEE ON EDUCATION AND LABOR

HOUSE OF REPRESENTATIVES

NINETY-SEVENTH CONGRESS

FIRST SESSION

ON

H.R. 66

TO EXTEND THE AUTHORIZATION OF APPROPRIATIONS UNDER THE VOCATIONAL EDUCATIONAL ACT OF 1963

HEARING HELD IN WASHINGTON, D.C., ON DECEMBER 10, 1981

Printed for the use of the Committee on Education and Labor

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HEARINGS ON REAUTHORIZATION OF THE VOCATIONAL EDUCATION ACT OF 1963

Part 10: Vocational Education Data System

THURSDAY, DECEMBER 10, 1981

HOUSE OF REPRESENTATIVES, SUBCOMMITTEE ON ELEMENTARY, SECONDARY, AND VOCATIONAL EDUCATION, COMMITTEE ON EDUCATION AND LABOR,

Washington, D.C.

The subcommittee met, pursuant to call, at 9:40 a.m., in room 2175, Rayburn House Office Building, Hon. Carl D. Perkins (chairman of the subcommittee) presiding.

Members present: Representatives Perkins, Craig, and Erdahl.

Staff present: John F. Jennings, counsel, and Nancy L. Kober, legislative specialist.

Chairman PERKINS. The Subcommittee on Elementary, Secondary, and Vocational Education is continuing hearings today on the reauthorization of the Vocational Education Act.

This morning we will be focusing on the vocational education data system, known as VEDS.

The Education Amendments of 1976 mandated the development and operation of a national Vocational Education Data System. The Secretary of Education and the Administrator of the National Center for Education Statistics were jointly charged with the responsibility for developing this system.

The law specifies that this system shall include information on students, programs, program completers and leavers, staff, facilities, and expenditures.

In mandating this system Congress was responding to a lack of adequate data to judge program effectiveness and to make important decisions about future directions.

Through the testimony today we hope to gain an understanding of how this system was developed, what types of information it is currently providing, and problems encountered in its development and operation. We would also like to know the cost, in dollars and person-hours, of generating this data, as well as any recommendations the witnesses may have for improving Federal vocational data collection.

I believe our objective ought to be to reduce the data collection to the absolute minimum while securing enough data to hold administrators accountable for the use of public funds.

Without objection, I am going to put these witnesses on all at once: Dr. Senese, Assistant Secretary, Office of Educational Re-

search and Improvement, U.S. Department of Education, accompanied by Dr. Robert Morgan, Director, Vocational Systems Section, System Design and Analysis Branch, U.S. Department of Education; Mr. Donald F. Averill, vice chancellor for vocational education and planning, Coast Community College District, Calif. and chairman, California Community and Junior College Association; and Dr. James Lee Harris, representing the American Vocational Association.

I am delighted to welcome all you gentlemen here this morning, and we will hear from Dr. Senese first.

Identify yourselves, all of you, for the record.

STATEMENT OF DONALD SENESE, ASSISTANT SECRETARY, OFFICE OF EDUCATIONAL RESEARCH AND IMPROVEMENT, U.S. DEPARTMENT OF EDUCATION

Dr. SENESE. Mr. Chairman, members of the subcommittee.

I am pleased to provide testimony on the development and operation of the national Vocational Education Data Systems [VEDS], operated by one of the components in my office, the National Center for Education Statistics [NCES]. I am accompanied by Dr. Frank Corrigan, Director of the Division of Postsecondary Education Statistics and Dr. Robert L. Morgan, VEDS Section Chief of NCES.

In addition I would like to submit a more extensive treatment of several of your questions under separate cover, prepared by NCES.

I would like to talk just very briefly on the history of VEDS. The creation of VEDS was mandated in Public Law 94-482, section 161(a) as part of the Education Amendments of 1976. The law called for NCES to develop, implement, and operate a national vocational education data system.

The specific questions to be answered by the Vocational Education Data System were:

Who is being served in vocational education programs?

What are they being served?

What is being accomplished? and

What is the cost?

Under this broadly defined congressional mandate NCES developed a comprehensive and complex system to study vocational education in the 50 States, the District of Columbia, and three outlying areas on an annual basis.

In developing the VEDS system, NCES consulted extensively with other Federal agencies, State agencies, postsecondary institutions, professional associations, and other interested groups.

The first year of reporting was 1978-79. The third year, 1980-81 collection is being reported to NCES this month.

The primary purpose of VEDS is to provide a national reporting and accountability system to generate uniform data from the States to support the decisionmaking activities of Congress with respect to the establishment of vocational education policies.

As far as the information currently contained in VEDS section 161(a) specifies that VEDS is to provide information on vocational: first, students, including their race and sex; second, programs;

third, program completers and leavers; fourth, staff; fifth, facilities; and sixth, expenditures.

VEDS currently contains information elements representing each of these areas except facilities. It was found that data on facilities are very stable, and that a recent study could meet the VEDS requirement for some time to come.

Section 161(a) also specifies that program evaluations to be conducted by the States under section 112(b) are to be contained in the VEDS system. Thus VEDS contains information concerning the extent to which program completers and leavers find employment in occupations related to their training.

There are departmental vocational education data collections other than VEDS. In recent years the Office of Civil Rights, the Office of Planning, Budget, and Evaluation, the National Institute of Education, the Office of Special Education and Rehabilitation Services, and the Office of Vocational and Adult Education [OVAE] all have undertaken or maintained major collections of vocational education data. VEDS, however, was specifically designed to be the prime source of vocational education data, largely subsuming these other collections.

NCES also conducts three major related efforts: The survey of noncollegiate postsecondary education, the higher education general information survey or HEGIS, and the national longitudinal studies.

The first, the survey of noncollegiate postsecondary education, provides information on degrees for a category of postsecondary institutions that are generally not included in the State vocational education plan. These data then can be merged with VEDS' State plan coverage.

The second study—HEGIS—deals largely with a population of schools for which there is a considerable overlap with the VEDS population.

The third, the national longitudinal studies, provides outcome data for a limited subset of students which can enrich the VEDS followup findings.

Particularly with regard to HEGIS, NCES acknowledges that there is a degree of duplication in these studies. However, NCES is developing a new unified system for school years 1982–83 which will simplify and consolidate HEGIS and VEDS reporting.

As far as the cost and burden of VEDS to the States it must be said at the outset that the data on this subject are relatively soft.

NCES has conducted a pilot study with eight States in an effort to develop a methodology for estimating cost and burden. This study provided results of only limited applicability to other States, but these estimates are the only ones available.

The total national estimated costs were as follows: Start-up costs, over an average 3-year start-up period, $10 to $35 million; annual operating costs, $45 to $55 million; and annual person time, 1,000 to 1,300 person-years—including estimates of local school district, institutional, and individual time.

In evaluating these costs two factors should be taken into account.

First, one of the most difficult problems was that of attributing particular costs of VEDS when facilities and personnel were shared

with other operations. Data collected during the study suggested that some States tended to overattribute costs to VEDS.

Second, as individual States mature in their data collection and processing capabilities, operating costs may be reduced.

As far as the Federal costs to establish and operate the VEDS program, costs incurred by NCES in the development and establishment of VEDS for the period from October 1976 through the end of fiscal year 1981 total approximately $3.5 million, with an additional $1.5 million spent for salaries. Half of the $3.5 million has been given directly to the States in the form of competitive capacity building grants.

VEDS represents a major effort by the Congress to insure more comprehensive, accurate, and reliable data about an area of American education which receives significant financial support from both the State and local levels.

VEDS, however, has encountered a variety of problems during its development, implementation, and operation. These problems have compelled the Department of Education to take a serious look at the VEDS system.

The first class of problems which were encountered during the developmental period concerned establishing the scope of the system. What institutions and programs could and should be studied?

NCES used the legislative mandate as the guiding framework. Only data which NCES decided could be reported by the States with reasonable accuracy would be included. In addition, the current system contains limited target group data beyond that directly mandated by the law.

A continuing controversy exists regarding the inclusion of non-State plan institutions in the VEDS data collection effort.

A second, definitional problems.

For the purpose of developing VEDS it was necessary to reach agreement as to the technical meaning of many vocational education terms. NCES, in cooperation with the States has attempted to clear up many of the misunderstandings concerning definition of terms.

However, problems still do exist in this area. For example, terms such as disadvantaged, limited English proficiency, handicapped, and related placement have been defined differently by various States, leading to data collection problems and incorrect data reporting.

NCES is continuing to work with the States on remaining definitional problems, although solutions are not apparent in all cases.

A third aspect: Cost and burden faced by the States.

The issue of cost and burden has been a major complaint about VEDS. Many States argue that to fulfill all the VEDS data requirements puts a heavy drain on their budgets, particularly in a time of fiscal austerity.

NCES has been sensitive to these concerns. Through capacity grants to States, a reduction in data elements, and training and technical assistance, NCES has tried to alleviate the burden. However costs and burden remain a major concern to all the respondents as well as to the Department.

Fourth. Respondent problems.

It was recognized early that for a variety of reasons some States literally could not come into full compliance with the legal mandate, primarily due to lack of sophistication of their existing data systems.

Working with the Office of the General Counsel, NCES developed regulations formalizing the concept of substantial compliance with the mandate, wherein these States could supply substantial amounts of the required data along with remediation plans showing how they would come into full compliance within a reasonable period of time.

Were it not for the creation of the substantial compliance category roughly two-thirds of the respondents would have had vocational education funds withheld in school year 1978-79.

And fifth, administrative problems.

There have been internal administration and data processing problems in NCES. These included forms design and the time period from data collection to publication.

I would like to comment on data collection plans for the school year 1981-82.

Now that 2 years of data have been collected NCES has begun an indepth review of VEDS.

In order to reduce the large cost and burden of VEDS while adhering to the congressional mandate, NCES has recently worked with OVAE and the Office of the General Counsel, as well as my own office, to curtail the VEDS collection sharply for the next data collection year, school year 1981-82.

In order to do this NCES plans to suspend several areas of the data collection which have been most burdensome to the States or least reliable in the data base. The States were notified of these changes by letter on November 3.

The suspensions are as follows:

One. Suspend the collection of teacher/staff data: These data are stable due to the lack of staff changes from year to year.

Second. Suspend the collection of employer followup data: These data also change very little from year to year.

Third. Suspend the collection of program leaver and followup data: These data also exhibit a low return rate and are expensive.

Fourth. Suspend the collection of certain enrollment and finance data: Definitional problems in the special needs areas make collection of this enrollment data difficult; some finance data which was difficult to collect was suspended.

We estimate these changes, this coming year, will reduce the man-hours approximately 48 percent, from 198,000 hours to about 102,000 hours annually.

Thank you.

[Material submitted by Dr. Senese follows:]

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Supplementary Information from NCES

This information is intended to supplement the testimony presented on the development and operation of the Vocational Education Data System (VEDS) presented by Donald J. Senese, Assistant Secretary for Educational Research and Improvement, Dr. Frank Corrigan, Acting Assistant Administrator, Division of Postsecondary and Vocational Education Statistics, and Robert L. Morgan, Director, Vocational Education Data System, National Center for Education Statistics, before the Subcommittee on Elementary, Secondary and Vocational Education of the Committee on Education and Labor of the House of Representatives. Specifically, this paper provides (a) a chronological history of the development of VEDS, and (b) a description of the types of data collected by VEDS.

As authorized by P.L. 94-482, the primary purpose of the Vocational Education Data System (VEDS) is to provide a national reporting system to generate uniform data from the States to support the decision-making activities of Congress with respect to the establishment of vocational education policies.

HISTORICAL BACKGROUND

On October 12, 1976, the Education Amendments of 1976 became law. House Report 94-1085 and the House Hearings on HR-94-19 constitute the legislative history upon which the development of the data system is based. Volume I of these hearings presented the full report of the GAO study of vocational education completed the previous year. The GAO report criticized the Administration for failure to require sufficient data to monitor State planning and State expenditures of Federal funds. Among other concerns expressed, it was concluded that better labor market data were needed, that improved follow-up data were needed, and that data were needed on both race and sex of program participants and completers. Throughout the hearings, numerous references were made to the lack of appropriate and comparable data across States on Vocational Education.

The specific questions to be answered by the vocational education data system according to the legislative history are: "Who is being served in vocational education programs? What are they being served? What is being accomplished? And what is the cost?"

Section 161(a) of P.L. 94-482 required that "the Commissioner and the Administrator of the National Center for Education Statistics jointly develop information elements and uniform definitions for a national vocational education data reporting and accounting system. This system shall include information resulting from the evaluations required to be conducted by 112(b) . . . and other information on vocational A) Students, B) Programs, C) Program completers and leavers, D) Staff, E) Facilities, and F) Expenditures." Congress required that the system be compatible with the Occupation Information System (Section 161(b)) and with the Comprehensive Employment and Training Act data system. Congress

also required that any State receiving Federal assistance supply information required by the Administrator and comply in its reports with the information elements and definitions prescribed.

Based on the legislative history, NCES and Bureau of Occupational and Adult Education (BOAE) staff met to begin the development of information elements and uniform definitions to be utilized in reporting on vocational education. On October 19, 1976, a central planning committee was formed to set strategies and to determine resource needs. Both NCES and BOAE began to identify potential user groups and collection overlaps with existing surveys.

The central planning committee met and agreed that four task forces should be formed to develop specific positions of topics of concern. These were: A) System Design, B) Completer/Leaver and Employer Follow-up, C) Definitions, and D) Bilingual Education. Each task force met in December with a broad representation of Federal and State interests represented. Position papers were prepared and reviewed by NCES and BOAE staff. Because of the high degree of overlap, the task forces were combined.

On January 12-14, 1977 over 50 Federal and State agency representatives met in general session. At this meeting there was extensive State involvement and many special interests were identified. For example, the Office for Civil Rights (OCR) expressed interest in Staff Racial/Ethnic by sex data at the six-digit program level of specificity. BOAE expressed interest in student data at the same level of specificity. OMB expressed interest in careful examination of other data sources to assure that no data being collected were redundant and that all relevant sources were utilized, as well as concern that the facilities area be

refined or culled. Several groups, both State and Federal, expressed interest in assuring that special target groups (e.g. handicapped) be identified by both the handicapping condition and vocational education services provided. Many States expressed interest in assuring that the data system have capacity for fulfilling evaluation and accountability requirements under P.L. 94-482. The Department of Labor expressed a need for high quality supply data from the vocational education sector to fulfill the National Occupation Information Coordinating Committee's (NOICC's) requirement for supply estimations. There was concern about just what information must be gathered by "labor market area," as well as the definition of that term.

Timing and interfaces with other data systems were discussed. States clearly indicated that considerable lead time was needed to establish a reliable, accurate system. States expressed concern about interface between Section 437* General Education Provisions Act (GEPA) and P.L. 94-142 (Special education) data systems. The issue of whether or not adult enrollments were to be separately accounted for and how consumed a large amount of time.

The linkage between program data and occupational data was discussed. Problems related to Handbook VI Standard Terminology for Curriculum and Instruction In Local and State School Systems and HEGIS Taxonomies Of Instructional Programs when applied to manpower planning were cited. Finally, another recurring question emerged, the sampling unit and reporting unit for the Federal reporting. The group was about evenly divided among those who felt that the vocational data system should collect data by 1) eligible recipient, 2) labor market area, and 3) State aggregate. At this point the concept of reporting versus record

*Now referred to as Section 406(a)

keeping emerged. That is, data at the local level would need to be somewhat more specific than that submitted to the Federal level in order to assure accurate sub-State labor supply information. The January meeting identified most of the major issues that were to be addressed in the development of the vocational data system. Also, this meeting reinforced the importance of State input in all developmental activities.

Due to the large number of questions concerning Congressional intent, a meeting was held between Congressional Committee counsels and NCES staff. One proposition advanced by the counsels was that all public vocational education should be included in the State Plan and that the notion of two distinct universes, State Plan versus all vocational education, was not the Congress' intent. Rather it was noted that the Congress intended that all publicly supported vocational education should be covered by the State Plan.

As a result of the meeting between Congressional and Department staff, Mr. Perkins, chairman of the authorization committee, sent a letter to the Administrator of NCES that granted a one-year delay in implementing the VEDS data collection activity and enumerated three conditions pursuant to the granting of that extension. These were: 1) full implementation by FY-79, 2) that the extra year be utilized in systems design, and 3) that every effort be made to interface with the CETA data system to achieve a "hand in glove" fit.

A review of other Federal agency collections was conducted. Bureau of Education for the Handicapped (BEH) and NCES staff met to determine the interfaces between P.L. 94-142 and P.L. 94-482. It was agreed, for example, that VEDS would collect the data required for monitoring P.L. 94-142 and that handicapped status would be based on Individual Education Plans (IEP's) at the elementary

and secondary levels. NCES and Veterans Administration staff met to determine if data collection of student follow-up information could be coordinated. At that time, after a series of meetings it was believed that far too many differences existed in the two laws to permit a common collection.

Meetings were held between CETA staff and NCES staff to determine the degree of consistency between the two data bases. Numerous differences were identified, especially in the recordkeeping and financial accounting areas. Even greater differences were seen in definitions in law. The primary reason for the differences was the high level of emphasis placed on public service employment by CETA and emphasis placed on occupational preparation by vocational education.

NCES, BOAE and Office of Planning, Budget, and Evaluation staff met to discuss the overlap among Section 437 of GEPA; Section 10[illegible] and 161(a) of P.L. 94-482. Careful examination of the provisions of each mandate clearly indicated that overlap was inherent in the legislation and that there was no legal basis for not collecting the data specified in each of these sections. It was agreed that every effort would be made to avoid duplication, but that legislative intervention would be necessary to clarify the roles of each unit with respect to these collection efforts. Finally, several internal NCES meetings were held on financial reporting, enrollment reporting, and staff reporting, and every effort was made to assure compatibility among survey terminology although this was not always technically feasible.

In March, two series of meetings began. The VEDS planning task force was formed and began meeting on March 4, 1977 on a weekly basis until May 25, 1978. The purpose of this task force was to develop uniform definitions for required

data elements and to resolve issues between agencies on reporting requirements and record keeping requirements. Several staff from the National Center for Education Statistics (NCES), Bureau of Occupational and Adult Education/ Associate Commissioner for Occupational Planning (BOAE/ACOP), Bureau of Occupational and Adult Education/Office of Planning (BOAE/OP), Bureau of Occupational and Adult Education/Division of Vocational and Technical Education (BOAE/DVTE), Office of Planning, Budget and Evaluation (OPBE), Bureau of Education for the Handicapped (BEH), Office for Civil Rights (OCR), National Occupation Information Coordinating Committee (NOICC), Department of Labor/ Employment Training Administration (DOL/ETA) and National Institute for Education (NIE), participated in the meetings.

On March 15, 1977, the first of a protracted series of Committee on Evaluation and Information Systems (CEIS - a committee of the Council of Chief State School Officers) vocational task force meetings began. This series of meetings focused on the data requirements of P.L. 94-482 in terms of both data burden and the ability of States to provide accurate, reliable data. This group provided input on 1) other related collections; 2) current collection practices in States; 3) conceptual input on systems design; and 4) State concerns about data burden.

A feasibility study was recommended in selected States to test the capacity of States to obtain reliable, accurate data for local education agencies and postsecondary institutions using the applicable data elements and definitions. Also, this study could provide empirical information on the costs of data acquisition both in terms of manpower and dollars. The remainder of the spring and summer was spent in developing and refining definitions and reporting

forms to be tested in the feasibility studies incorporating input.

During June and July 1977, the rather complex Federal forms clearance process for the feasibility study began. During August and September feasibility study contracts were let. The selection of States to participate in the feasibility study was based in part on an attempt to represent the range of reporting abilities. The feasibility study was separated into three components. They were: Educational Process; Educational Impact; and Educational Finance. Within each component being tested, one State was selected that, at least in theory, had current capacity to provide required data, one State which presently reported inability to provide such data and one State which had innovative solutions to data collection which were not fully implemented.

The participating States by component were: Colorado, Illinois and Texas - the education process component; Colorado, Minnesota and Pennsylvania - the education impact component; and California, Oklahoma and Utah the educational finance component. Wisconsin conducted the study using all three components at State expense.

Even though the feasibility study's scope of work was very detailed, operational questions raised by the participating States made it clear that inter-State coordination was essential if compatible results were to be achieved. For that reason, a series of meetings were held to assure coordination. It was apparent that many operational definitions and decisions were necessary to actually implement the data collection at the local level. Over a period of three months each form was restructured and refined.

90-876 O—82——3

On reviewing the results of the feasibility study, the States recommended that only data that closely approximated the BOAE collection, which was to be supplanted by VEDS, be requested for 1978-79 and that NCES develop the forms for the collection such that data for 1979-80 be made voluntary. By approaching the problem in this manner, it was contended that States would not be forced to report inaccurate data and that States could provide substantive reasons for not providing voluntary data thereby identifying areas where technical assistance is needed. Based on these findings NCES staff once again revised the forms.

The first public meeting on the revised forms was held in Washington, D.C., May, 1978 at the State Directors of Vocational Education conference. The primary concern of this group was the funding for implementation rather than the data per se.

The second public meeting produced more technical comments. This occurred at the American Vocational Information Association (AVIA), May 23-25, 1978, in Oklahoma City. Forty-one States were represented at the meeting with over 100 participants. Most of the people in attendance were directly involved with the actual data collection within the States. The recurring concern of the meeting was how data could be obtained on the public sector of Vocational Education not covered by the State Plan. It was the opinion of almost all States in attendance that the data, other than State data, could be obtained on vocational programs covered by the State Plan, but it was the clear consensus of the group that the Vocational Education Agencies could not provide even accurate estimates of data not covered by the State Plan.

It should be noted that most States had some segment of public vocational education not covered by the State Plan. States recommended that NCES conduct a separate study to determine for each State that sector not covered by the State Plan, and that other collection procedures be developed to collect that data. There were concerns about the status of the facilities report and evaluations required by Section 112(b)(1)(a) of P.L. 94-482, both of which are postponed indefinitely.

The Staff form, however, was the most serious concern in terms of the technical abilities of States to provide accurate data. Full-time Equivalent (FTE) calculations were not standardized in terms of the denominator. The participating States wanted clear standardization of the computations such that standard data would be available. They recommended that 500 contact hours be adopted for postsecondary institutions and 1000 contact hours be utilized for the secondary level as standard denominators in FTE calculations. A few States questioned the need for six-digit precision in Staff data for FTE.

Other concerns were: 1) that the variable secondary grade level definition for program enrollment be standardized to grades 11 and 12 for Part A; 2) that Consumer and Homemaking be divided into six-digit Handbook VI categories; and 3) special needs definitions be further refined. As a result of this meeting, all forms were revised by NCES staff.

NCES, as part of the technical assistance to States, began a series of four 5-day regional workshops beginning in October 1978. Both lecture and demonstration were utilized to assure that personnel from each State fully understood the reporting requirements of the data system.

As a result of this workshop, it became quite clear that the implementation of VEDS required not merely a modification of existing data collection systems, but in most States a total development effort starting from "ground zero." More specifically, many States' representatives freely admitted that they had been providing at best, estimated data on unduplicated counts of enrollment and completers, subjective data on follow-up outcomes, and crude estimates of Staff assignments. Without doubt, the financial area was the least developed of the current data components. Accounting for funds by legislative purpose revenue was beyond the capacity of most States, for non-Federal funds.

Further, it was found that the within-State governance structures were much more important in establishing a uniform reporting structure than previously thought. In States that had strong centralized governance structures, the implementation was straightforward. However, in States where some vocational education activities were delegated to agencies not directly reporting to the State Board for Vocational Education (e.g. community colleges or secondary education), the integration of the data requirements generated far greater difficulty. In many States, interagency communication was not very effective as evidenced by the fact that many participants had never seen the VEDS forms prior to the workshops.

Beginning in March 1979, Presidents of junior and community colleges initiated a major effort to impact the VEDS requirements for 1978-79. Among the problems identified were: staff FTE calculation; identification of leavers; identification of persons who completed at least 50% of their programs; cost/benefit of participation in the Federal program; Veterans Administration requirements for student follow-up; financial accounting; and postsecondary program definition.

A series of meetings were held to discuss these and other issues with representatives of the postsecondary sector beginning in May of 1979. These meetings led to a restructuring of the VEDS data collection for 1979-80 and forward into 1) elementary-secondary; 2) postsecondary regionally accredited institutions; 3) postsecondary institutions not regionally accredited (State-approved); and 4) postsecondary vocational offerings in elementary-secondary institutional settings (Other postsecondary).

Most of the postsecondary institutions contended that data normally flowed in these four streams and that the quality of the data would in fact be improved if each State submitted data in this format.

Responses to some of the issues raised by the postsecondary community led NCES to conclude that staff FTE by assignment had so many technical flaws that it should not be utilized at any level. Overlap between Veterans Administration and VEDS data collections was cited, but had been mainly resolved. Financial accounting problems were partially solved through legislative action. The postsecondary/adult program definition was no longer a major concern because of the change made in the level definitions. Perhaps the largest gain from the interaction with the representatives of postsecondary institutions was surfacing the overlap between VEDS and the HEGIS earned degree reporting. This has been addressed and will be finally solved in 1982-83 reporting.

The CEIS Vocational Education Task Force, as a result of the Spring 1979 meeting, began to develop a position paper on VEDS. Implicitly this paper endorsed the 1978-79 collection methodology and the notion of a centralized data system similar to VEDS housed in NCES. This paper specifically identified issues and problems remaining with the proposed 1979-80 VEDS instruments and techniques.

At the San Antonio annual meeting of CEIS, October 22-25, 1979, NCES presented its position in response to the CEIS paper to the Vocational Education task force. All parties recognized that NCES had met the great majority of CEIS expressed concerns in the position paper. Even those persons who spoke against recommending VEDS noted that NCES had been very responsive to CCSSO' task force. However, SEAs claimed that VEDS set a precedent for student unit accounting which could not be endorsed. Those speaking on behalf of recommending VEDS noted burden reduction in other collections, replacement of other surveys and uniform data definitions as reasons for support.

Thus for the 1979-80 school year the postsecondary collection was placed in so-called "streams" or separate categories and numerous minor changes were made based on issues raised by the postsecondary community. In addition, a few minor changes were made in the secondary sector. Modified forms incorporating these changes were submitted to FEDAC with a request for a three-year clearance in order to assure system stability over time. In keeping with this clearance, the 1980-81 data collection employed forms essentially identical to those used in 1979-80.

With respect to developments in progress for the current reporting year (1981-82), the reporting requirements for VEDS have been carefully reviewed based on data submitted by the States in the first two years of the system. Several required information items have produced extremely soft data, and have been unduly burdensome to States as well. Several meetings have been held with CEIS and with the Postsecondary Task Forces to determine how best to approach problems that have been revealed in three areas: special needs; leaver follow-up; and employer follow-up.

As a result of this work, it has been suggested that a temporary suspension of certain items would be in the best interest of States and the Federal government. Between January, 1981 and November, 1981 OERI/NCES and OVAE jointly worked with the Office of General Counsel and other Department of Education staff to assure that data suspensions could be legally permissible. On November 23, 1981, Executive Officers of the Sole Boards of Vocational Education were notified of certain suspensions, which are presented in the following table. In addition, in 1982-83, NCES' new unified program taxonomy (which has been developed in collaboration with the States) will be used to provide a simplified program stub and to consolidate HEGIS and VEDS reporting.

THE TYPES OF DATA COLLECTED

Table 1 presents by year of collection the data collected by VEDS, from the first collection completed for the 1978-79 school year until the expiration date for the current authorization. In both 1979-80 and 1980-81 school years, all data contained in the system were collected. For subsequent school years the special needs data, leaver follow-up and employer follow-up have been suspended while NCES further assesses the methodology for collecting these types of data.

Form and Section Titles	School Years					
	78-79	79-80	80-81	81-82	82-83	83-84
Secondary Program Enrollment						
Part A - Occ. Specific						
Total Enrollment	X	X	X	X	X	X
Racial/Ethnic Desig. and Sex	X	X	X	X	X	X
Special Needs		X	X			
Program Completers	X	X	X	X	X	X
Part B - Other Voc. Ed.						
Total Enrollment	X	X	X	X	X	X
Racial/Ethnic Desig. and Sex	X	X	X	X	X	X
Special Needs		X	X			
Enrollment by Program Level	X	X	X	X	X	X
Part C						
Special Needs by Instruc. Setting		X	X	X	X	X
Part D						
Enroll. in Cooperative Voc. Ed.	X	X	X	X	X	X
Part E						
Participation by Legislative Purp.	X	X	X	X	X	X
				Work Study Only		
Postsecondary Program Enrollment						
Part A - Occ. Specific						
Total Enrollment	X	X	X	X	X	X
Racial/Ethnic Desig. and Sex	X	X	X	X	X	X
Non-resident Alien		X	X	X	X	X
				Region. Accred. Only		
Special Needs		X	X			
Program Completers	X	X	X	X	X	X
Part B - Other Voc. Ed.						
Total Enrollment	X	X	X	X	X	X
Racial/Ethnic Desig. and Sex	X	X	X	X	X	X
Non-resident Alien		X	X	X	X	X
				Region. Accred. Only		
Special Needs		X	X			

Table 1 - continued

Form and Section Titles	School Years					
	78-79	79-80	80-81	81-82	82-83	83-84
Postsecondary Program Enrollment						
Part C						
Special Needs by Instruc. Setting		X	X	X	X	X
Part D						
Enroll. in Co-op and Appren.	X	X	X	X	X	X
Part E						
Participation by Legislative Purp.	X	X	X	X Work Study Only	X	X
Teacher/Staff - Secondary Inst.						
Total Staff	X	X	X			X
Racial/Ethnic Desig. Totals		X	X			X
Teacher/Staff - Postsecondary Inst.						
Total Staff	X	X	X			X
Racial/Ethnic Desig. Totals		X	X			X
Part-time		X	X			X
Finance						
Part A						
Section 110 - Setasides	X	X	X	X	X	X
Section 120 - Basic Grant	X	X	X	X	X	X
Section 130 - Ex. & Innov.	X	X	X	X	X	X
Section 140 - Disadvantaged	X	X	X	X	X	X
Section 150 - C & HE	X	X	X	X	X	X
Section 102(d) - Plan. & Eval.		X	X	X	X	X
Part B						
Instruc. Expenditure by Program		X	X	X	X	X
Part C						
Setasides by Stream*		X	X			

*Secondary
Regionally Accredited
State Approved
Other Postsecondary

90-876 O—82——4

Table 1 - continued

Form and Section Titles	School Years					
	78-79	79-80	80-81	81-82	82-83	83-84
Secondary Completer/Leaver						
Part A(1) Employment Status of Completers by Instructional Program	*X	X	X	X	X	X
Part A(2) Employment Status of Leavers by Instructional Program	*X	X	X			
Part B(1) Employment Status of Completers by Racial/Ethnic/Sex Designation		X	X	X	X	X
Part B(2) Employment Status of Leavers by Racial/Ethnic/Sex Designation		X	X			
Part C(1) Employment Status of Completers by Special Need		X	X	X	X	X
Part C(2) Employment Status of Leavers by Special Need		X	X			
Part D Field of Employment and Average Hourly Salary by Instructional Program	*X	X	X	X	X	X Avg. hour. salary only
Postsecondary Completer/Leaver						
Part A(1) Employment Status of Completers by Instructional Program	*X	X	X	X	X	X
Part A(2) Employment Status of Leavers by Instructional Program	*X	X	X			
Part B(1) Employment Status of Completers by Racial/Ethnic/Sex Designation		X	X	X	X	X
Part B(2) Employment Status of Leavers by Racial/Ethnic/Sex Designation		X	X			
Part C(1) Employment Status of Completers by Special Need		X	X	X	X	X
Part C(2) Employment Status of Leavers by Special Need		X	X			

*Collected but not streamed.

Table 1 - continued

Form and Section Titles	School Years					
	78-79	79-80	80-81	81-82	82-83	83-84
Postsecondary Completers/Leavers						
Part D Field of Employment and Average Hourly Salary by Instructional Program	*X	X	X	X Avg. Hour. Salary only	X	X
Part E Employment Status by Degree Conferred		X	X	X	X	X
Employer Follow-up - Secondary						
Part A Mean of Employer Rating by Instructional Program	*X	X	X			
Part B Mean Rating by Racial/ Ethnic/Sex Designation		X	X			
Part C Mean Rating by Special Need		X	X			
Part D Mean Rating by Completion Status	*X	X	X			
Employer Follow-up - Postsecondary						
Part A Mean of Employer Rating by Instructional Program	*X	X	X			
Part B Mean Rating by Racial/ Ethnic/Sex Designation		X	X			
Part C Mean Rating by Special Need		X	X			
Part D Mean Rating by Completion Status	*X	X	X			

*Collected but not streamed.

Chairman PERKINS. All right, our next witness.
Go right ahead, Mr. Averill.

STATEMENT OF DONALD F. AVERILL, VICE CHANCELLOR FOR VOCATIONAL EDUCATION AND PLANNING, COAST COMMUNITY COLLEGE DISTRICT, CALIFORNIA, AND CHAIRMAN, CALIFORNIA COMMUNITY AND JUNIOR COLLEGE ASSOCIATION

Mr. AVERILL. Mr. Chairman and members of the subcommittee, I appreciate this opportunity to present the views of the American Association of Community and Junior Colleges on the Vocational Education Data System.

I am Donald Averill and I am vice chancellor for vocational education and educational planning for the Coast Community College District in Costa Mesa, Calif.

In my testimony, unlike some of the other presenters here today I do represent a college district. I do have the primary responsibility within that college district for the collection of all college reporting data which goes to the State or the Federal Government. However, I am not a principal researcher and I have staff that does that type of task. So my testimony, to a great degree, is going to look at some other variables than those which are administrative variables and causing us a considerable amount of difficulty and concern.

The State of California several years ago started working very closely with NCES about its concerns regarding VEDS, and I can report that Dr. Morgan and his staff came out to California. We sent people back here to Washington, and we spent several weeks trying to modify that system and make it more meaningful. A lot of that effort has been reported today.

I think that that has been a positive approach.

However, there are still a number of concerns that we in California have had and the 14 other States that have joined us that are not resolved and are substantial problems to us in California.

I think the first and foremost is that you have to look at postsecondary education considerably differently than it is either by the act or by VEDS itself. There is a concern that what the act called for in measurement and some of the problems of VEDS does exist in the act and not in the collection system or the processes in which NCES has had to go about implementing the act itself.

We feel that there needs to be a major change in the act itself in terms of that data collection system.

Coast has approximately 38,000 full-time equivalent students in three colleges. The average college nationally is approximately 2,000 full-time equivalent students. We generate, or to generate that FTE, full-time equivalent, would require an unduplicated head count of 160,000 students or 4.21 students per full-time equivalent.

The average college then in the State would have to have 8,400 enrollment to generate that 2,000 full-time equivalent.

You can see that that type of data base compounds the collection problem tremendously. It makes a totally different type of setting than that is faced by a secondary system delivering vocational education.

With this range the difference in collection of data will have almost uncontrollable ranges of sophistication in how they collect and record that data, and that's a major concern to us.

We feel that in California and in most of the community colleges throughout this Nation that if we are going to collect data that that data ought to have management applicability in the community college in which it is being collected.

If that data is getting back and is being distorted by aggregation, by lack of definition in several of the points which were reported by our previous speaker, we do not have valuable data information, we cannot make wise management decisions or act upon it.

Both the act and the VEDS requirement of section 112(b) do not reflect the changing mission of the community colleges. Fortunately reauthorization has discussed new population needs such as the upgrading of skills, economic development efforts, and technological explosion and the role that the community colleges play and have played for a long time in implementing these needs.

Community colleges have addressed these needs for years, but VEDS doesn't measure this area at all but focuses on the narrower scope of entry level enrollment.

California provided for program assessment of its vocational programs prior to the VEDS requirements, and I think that one of our other speakers today will be addressing this same issue in depth for their State.

The California occupational program evaluation system [COPES] provides management feedback of data immediately to the colleges, resulting in program improvement.

The student accountability model [SAM] and a longitudinal study of that which is being fostered by our district and operated by our district provides readily usable information regarding student populations. VEDS actually has allowed us to use that SAM system for portions of the student accountability model of VEDS, and it has been helpful in bringing some consistency between the two measuring instruments.

A State uniform reporting system now is going into place and will be fully operational in 1981-82. That addresses the broad college factors of students, personnel, facilities and budgets. Factors collected on this are uniform and do not vary between the colleges because the data elements have been defined for the State.

However, there is an inconsistency when you compare that data back to the VEDS data base and information which is not required for the State system and is required on VEDS.

VEDS or its counterpart should be compatible with existing systems and should provide usable management information to the local colleges.

The next area that we find a great deal of problem is in, within the employer data base, and fortunately today it's been reported that that is going to be withdrawn from the collection system for 1981-82.

We feel very strongly that that type of system is one in which it has been held down to avoid invasion of privacy, it draws on broad concepts rather than specifics, and it should make better wide-range comparisons. We feel again, that with this particular system that it should be statistically accurate, and we feel that possibly

the only way to do that is not through a VEDS system but through a system similar to a Gallup report-type of survey.

I support the need for Congress to determine if it is achieving its objectives from Federal funding, however the system should not cost more than the amount being funded. Currently in California, particularly in the coast district, Federal funding for vocational education amounts to only 3.2 percent of my total expenditure in vocational education. The data should be reliable and valid for both Federal purposes and for local management purposes. Obviously, I think we have heard already today from the administering agency that there are some difficulties with that.

The data should reflect the vocational enterprise it is to measure and not attempt to compare it to problems with different, and programs with different, purposes. And it does not do that, and there has been continuing difficulty with that.

The accountability model should address the management information described in the State plan for vocational education which could be included in an annual program report to the Federal Government. We are seeking that type of consistency and asking that if we are to be measured that that measurement be meaningful and that that measurement have applicability to the management of our programs.

Thank you.

Chairman PERKINS. Thank you very much. That was excellent testimony.

[The prepared statement of Donald Averill follows:]

PREPARED STATEMENT OF DONALD AVERILL, VICE CHANCELLOR FOR VOCATIONAL EDUCATION AND PLANNING, COAST COMMUNITY COLLEGE DISTRICT, COSTA MESA, CALIF., CHAIRMAN, CALIFORNIA COMMUNITY AND JUNIOR COLLEGE ASSOCIATION, COMMITTEE ON VOCATIONAL EDUCATION ON BEHALF OF AMERICAN ASSOCIATION OF COMMUNITY AND JUNIOR COLLEGES

Mr. Chairman and Members of the Subcommittee: I appreciate this opportunity to present the views of the American Association of Community and Junior Colleges (AACJC) on the Vocational Education Data System. I am Donald Averill, Vice Chancellor for Vocational Education and Planning, Coast Community College District, Costa Mesa, California.

"It is noteworthy that 54 of 57 States and outlying areas came into compliance with the laws and regulations in the first operational year of the system, and that we expect similar results for the second year," a quote from a March 1981 letter to Senator Hayakawa from Marie Eldridge. I shudder, my—how the questionable data I'm required to provide changes in its journey from my college to the federal government. I'm astounded at the marvels of data processing.

Let's review some of the basic problem areas which the Vocational Education Data System (VEDS) must address before the vocational education enterprise can be reliably described or judged for its effectiveness. We must address the two basic questions posed in the Federal Act, are program completers and leavers finding employment in occupations related to their training, and are they considered by their employers to be well trained and prepared for employment?

First, let's discuss what VEDS should do and does not do.

1. VEDS should describe accurately and meaningfully the vocational education enterprise as it is conducted at the local college level—which it does not do.

2. VEDS should collect data which is useful at the local college level for purposes of administration and improvement of programs—which it does not do.

3. VEDS should answer the basic questions which Congress asks in Section 112(b) of the Vocational Education Act—which it does not do.

4. VEDS should generate useful data when aggregated at the state and national level that are valid for the purposes stated in Section 112(b)—which it does not do.

Secondly, let's discuss some of the basic reasons why VEDS is not useful, valid and in keeping with the intentions of the Vocational Education Act as it should be.

1. The basic taxonomy problem has not been resolved, nationally or locally. This tends to nullify the validity of aggregate data at any level. The incompatibility of educational taxonomies with classifications used in industry and labor precludes validity of the data for supply and demand purposes. The taxonomy fosters duplication of reporting and adds to the local college data burden. Additionally, the incompatible VEDS definition of programs confounds the collection process.

2. The attempt at standardization of national data elements for VEDS has not been successful. A prime example is the concept of completers/leavers in California community colleges. Definition of programs is another example.

3. The specificity of data collection often precludes statistical sampling techniques at the local college level. Often the cost is far too high for the benefits received.

4. The design of VEDS follow-up compounds the errors and, consequently, the information is of little value for evaluation and planning purposes.

5. The required schedule for collecting and reporting data for VEDS is incompatible with the operations of colleges. VEDS requirements, decisions, mandates, etc., are unrealistic in terms of implementing changes in the processes of data collection at the college level. Oftentimes, two years is required to make a substantial change in data collection.

6. The cost of implementing VEDS has been excessive. The indecision, modifications and change of signals have been additionally frustrating for all concerned.

7. Finally, VEDS in California has disrupted a planned process of improving data collection from community colleges, which was started prior to the 1976 Vocational Education Act. Data collection must be useful and must have the support and commitment of local colleges if the required objectives are to be achieved. When federal funds for vocational education are but a small portion of the total funds expended for the vocational education enterprise, local colleges and state agencies must have a greater voice in the national data collection system. Let's take a fresh look at the total problem.

Conclusions

We have learned far more about vocational education in California from our statewide longitudinal study than from VEDS data. We have confidence in our longitudinal data and the process is much more cost effective.

Standardization of data elements and additional detail should be limited to state level management and described in the State Plan for Vocational Education. The findings of evaluation studies and summaries of statistical data collection should be included in an annual report to the federal government.

Chairman PERKINS. Dr. Harris. Go ahead.

STATEMENT OF JAMES LEE HARRIS, DIRECTOR, COLORADO STATE OCCUPATIONAL INFORMATION COORDINATING COMMITTEE, DENVER, COLO., REPRESENTING AMERICAN VOCATIONAL ASSOCIATION

Dr. HARRIS. Mr. Chairman, members of the committee, I am pleased to be here to speak with you all today on a topic I consider very important, the Vocational Education Data System or VEDS.

My name is Jim Harris. I have been a management information system supervisor in three States, Kansas, Colorado, and Oklahoma for 14 years. I recently changed jobs. I am now SOICC director in Colorado.

I believe that I understand the issues, many of the issues related to VEDS from State and local perspective, and I hope that my testimony will be a contribution to you as you make your deliberations in the future.

VEDS is a good system but it is not perfect. There are seven actions that I believe Congress can take to improve the system and to reduce the controversy that surrounds it. These actions expressed as recommendations are as follows:

A data use plan should be developed at the Federal level. This plan should identify the goals and/or objectives where achievement

will be measured. It should identify how achievement will be measured and should identify the data necessary for measurement.

Only the data that are needed for national decisionmaking should be collected and reported to the Federal Government through a basic data system.

Every data item in the system should be operationally defined.

The Federal reporting systems concerning occupational education and training should be consolidated into a single system. If this is not accomplished, at a minimum, Federal definitions for various systems should be consistent.

There should be funding provided for data systems.

States should have the responsibility for collecting data from local agencies and institutions reporting to the Federal Government.

Sampling or special studies should be used for other special data needs not covered in the basic data system.

At first glance it seems that there is a large number of issues related to VEDS. My analysis, however, would reveal that there are three basic issues:

No. 1 is the cost of the data collection.

No. 2 is the use of the data.

And No. 3 is the accuracy of the data.

Cost may be the most critical issue. State and local officials are concerned about the use of resources or taking resources from student-oriented services to use in the data gathering and reporting process. Balanced against this concern is the recognition of the need for management information.

And therefore the second major issue evolves from the first major issue, and that is the use of data. Only data, in my opinion, with a clearly specific and legitimate use should be reported to higher levels of Government. And I think, in my mind, acceptable use involves the using of data in a predefined decisionmaking process with actions resulting from the decisions.

The third area or issue is data accuracy, and obviously if data is going to be used for meaningful decisions it should be accurate.

The cost of VEDS. An examination of the information available shows that nobody really knows what VEDS costs. The estimates range all over the map from a few dollars a student to $50 or $60 a student.

An independent systems analyst has told me it can cost between $8 and $10 a student, given that the local institutions maintain normal data bases used in management at the local level.

The Federal share of VEDS costs varies from State to State. In some States the entire VEDS package would be collected without the Federal mandate. In some States nothing would be collected without the Federal mandate.

There are several factors which can, and have increased the costs of VEDS in the last few years. The first factor is the changing of data requirements or definitions. And this, of course, changes systems up and down the line from the local institution to the Federal Government.

The second factor which can increase the cost of VEDS is the collection, maintenance and reporting of almost duplicate data elements for various Federal reporting systems. And obviously if you

are going to report, if you are going to follow up a student three or four different ways, the same student, the local institution can lose credibility, the State can lose credibility.

If we are going to followup the Veterans' Administration followup, the VEDS followup, and CETA followups to the same student sometimes, it is a problem.

A third factor which is associated with high costs is the sheer size of the data bases which are collected, maintained and reported. As you have heard this size is going to be reduced.

But for my State we almost, we prepare almost 30,000 entries on the VEDS forms each year, and I might say that it takes a good secretary about 80 hours to type the VEDS reports.

Use of the data. I guess the problem is that local administrators and State administrators have some questions about the use of the data. First of all, will it be used? And second of all, if it is used will it be used in a logical manner, recognizing the shortfalls and the problems with data collection and whether the data is strong?

And third, what decisions will be made from the use of the data?

And fourth, what actions will result from the decisions?

In my State the legislature mandated the cost-effectiveness system, and the cost-effectiveness system evaluates programs on the basis of the bang for the dollar, if you will.

Chairman PERKINS. I have to ask that we suspend for about 6 or 7 minutes, to go over and vote. We will be right back. Just be at ease, all of you, until we come back.

[Recess.]

Chairman PERKINS. Go ahead, Dr. Harris, and we will finish it.

Dr. HARRIS. Thank you, sir.

Do you want me to resume where I left off?

Chairman PERKINS. Yes. Go ahead and resume your statement.

Dr. HARRIS. OK.

As I said, a data use plan can improve the quality of data significantly when people know what the data is going to be used for, and I would like to give you an example that is found in one State, or was found in one State.

The State legislature had required a system similar to VEDS for over 10 years, and the quality of data had improved initially but had reached a plateau.

In 1978 the State legislature decided that they wanted to have evaluated programs and shut programs that were inefficient so that they would have resources to open new programs. And they attached a footnote to the State appropriations bill which required a cost effectiveness evaluation

This cost effectiveness evaluation was geared on the key points in the Federal law, I think, some of the key points in the Federal law at least. It involved cost per FTE, it involved services to the disadvantaged, the handicapped, minorities, it involved sex balance, and it involved the key criteria of placement and completion.

In this State there were 35 programs closed last year and 37 on probation and several hundred had been improved, and of course new programs had been added to replace those that had been closed. One of the neat things about this system was that now everybody makes a maximum effort to get the data as accurate as possible and almost nobody questions the need for accurate data.

They do, however, question the contents of the formula, and we will probably revise the formula this year.

The evaluation process and the associated data system contain what many systems analysts feel are the ingredients for a meaningful management process.

First, the need for the data was evident.

Second, the definitions were clear.

Third, there was a clear decision process for use of the data, and

Fourth, action was taken on the decisions that were based on the data.

This is not an appropriate system for the Federal Government, but this works very well in the State.

Accuracy of the data, of course, as I mentioned earlier, if the data is going to be used for meaningful decisions accuracy of the data is a very important factor. And decisions based on bad data are probably more detrimental to the public good than decisions based on no data. And, without question, VEDS has accuracy problems. In my opinion they are not monumental or unsolvable problems, but they do affect data quality.

From a strictly head count perspective or gross dollar perspective the data is probably very accurate. When a clearly defined variable is inserted the data suffers slightly, and as the definitions or the difficulty of data, the difficulty of obtaining data increases, the quality of data decreases, down to the level when variables on subjective opinion which are biased by outside factors or inserted, the credibility of the data becomes nonexistent.

And VEDS has examples of data up and down the line, good and bad data.

A good example of a data item which is probably well reported is enrollment by program, in my opinion. That is because States have been doing this type of reporting for many years. There are, of course, problems in areas of confusion that cause data not to be perfect, and I think Don Averile has mentioned some of those problems, especially at the community college level.

The introduction of level of training confuses the picture slightly. In my State the legislature's definition of a postsecondary student is not what the Federal definition of a postsecondary student is, so we prepare two different reports, one for the legislature and one for the Congress.

A variable like sex of student causes no problem. That is easily identifiable by people on the scene and people doing the reporting.

Disadvantaged and handicapped definitions, on the other hand, although I believe they are operationally defined in a usable manner in VEDS, they are difficult to collect because it requires identification of a student to a bunch of serious processes and time-consuming processes. I believe that the data quality there is not what it could be.

Expanding the handicapped variable to types of handicapped increases the likelihood of error in the data. And a data item like limited English proficiency, the validity of that data is practically nil. It's totally subjective. There is no objective measure at all. It's the opinion of somebody, and people are often not willing to make a judgment that the student has a limited English proficiency problem.

The employer part of VEDS, which is a very, very important concept, in my opinion, the data that is reported to VEDS is worthless. Even if it's not worthless it is so close that it certainly is not worth the money spent. And the reason is that employers are extremely reluctant to report poorly on a student. So if they don't feel that the student reflects quality vocational education they don't send us a report.

In my State for 1979 and 1980, if we can believe the employer data there were virtually no poorly prepared students, and we know that there had to be because some of our programs weren't what we wanted them to be.

In summary, data is expensive and should be collected and reported only for an identified use. A data plan at the Federal level would be helpful in two ways.

First, it would identify where data is necessary, and

Second, it would demonstrate the importance of the information, because you have got a plan, that you are going to use it.

VEDS should be modified to serve a data use plan.

And for the questions you have on special topics, special topics should be covered. That type of data should be covered on a national sample and could answer many of the questions that you do have.

Since the information for decision should be accurate, all VEDS definitions must be clear, precise and easily usable. If we can't define a data item clearly then we can't collect it.

Duplication of systems, of data items, with slightly different definitions, is very expensive. If we could eliminate duplication of reporting between CETA, HEGIS, VEDS, and so forth, we could save enormous amounts of money at the local and State level.

There should be specific language in the Federal legislation which funds data collection. This would clarify the importance of information and relieve the pressure on the local and State officials who now must assume the responsibility for allocating funds to this effort in what many people believe to be the expense of student-oriented services.

Finally, States should have the data reporting responsibility to the Federal Government and the collection from the local schools. This, I believe, is very important because if the schools are reporting to the Federal Government they must also report to the State governments, and this would be a duplication of reporting.

I thank you for your attention, sir, and appreciate this opportunity to speak with you.

[The prepared statement of James Lee Harris follows:]

PREPARED STATEMENT OF DR. JAMES LEE HARRIS, DIRECTOR, COLORADO STATE OCCUPATIONAL INFORMATION COORDINATING COMMITTEE (SOICC), DENVER, COLO.

Mr. Chairman, Committee Members: I am pleased to be here to speak with you on a topic that I feel is very important, the Vocational Education Data System (VEDS), Mandated under the 1976 Amendments to the 1963 Vocational Education Act.

My name is Jim Harris. I am presently Director of the Colorado State Occupational Information Coordinating Committee. I have held this position for four months. Prior to July of this year I spent fourteen years as a Vocational Education Management Information Systems Supervisor in three states—Colorado, Kansas, and Oklahoma. I served on the National Center for Education Statistics committees that explored the Vocational Education Data System concept in 1977 and the group that conducted feasibility studies in 1978. I have prepared all reports submitted by Colo-

rado under the VEDS system during the past three years. Finally, I served on the Executive Committee of the American Vocational Information Association during the years when VEDS was being developed.

I believe that I understand many of the issues related to data collection in Vocational Education from a state and local perspective. I hope that my testimony will be of service to you as you deliberate the reeauthorization of the Vocational Education Act in the coming months.

VEDS is a good system but not perfect. There are seven actions that I believe Congress can take to improve the system and to reduce the controversy that surrounds it. These actions expressed as recommendations are as follows.

RECOMMENDATIONS

1. A data use plan should be developed at the Federal level. This plan should identify the goals and/or objectives where achievement will be measured, how achievement will be measured, and the data necessary for measurement.
2. Only data that are needed for national decision making will be collected in the basic data system at the federal level.
3. Every data item in the system should be operationally defined. For example, a disadvantaged student is operationally defined as a student who qualifies for financial aid under an economic need program.
4. Federal reporting systems concerning occupational training activities should be consolidated into a single system. If this is not accomplished, at a minimum, federal requirements for data should be definitionally consistent across the various federal reporting systems.
5. There should be funding specified for data systems.
6. States should have the responsibility for collecting data from local agencies and institutions and reporting to the Federal Government.
7. Sampling or special studies should be used for other special data needs not covered in the basic data system.

BACKGROUND

The law requires that each state shall evaluate, by using data collected, wherever possible, by statistically valid sampling techniques, each such program with in the state which purports to impart entry level job skills according to the extent to which programs completers and leavers. . . .

i. fine employment in occupations related to their training, and

ii. are considered by their employers to be well-trained and prepared for employment. . . .

The law further states that: This system (VEDS) shall include information resulting from the evaluation required to be conducted by section 112 (above) and other information on vocational. . . .

(A) students (including information on their race and sex), (B) programs, (C) program completers and leavers, (D) staff, (E) facilities, and (F) expenditures. . . .

Given the law, the National Center for Education Statistics immediately held a series of conferences with local and state administrators. During these meetings, ideas and arguments were exchanged.

Shortly after the initial conferences had been completed, the Center developed a summary of the basic elements required and called a group of state and local representatives together to discuss possible definitions and collection procedures. When this task had been completed, the Center tested the system in ten states and made modifications where the test indicated they were necessary.

The system has been operational for three years, the third annual report was submitted ten days ago. During this three-year period, the system has changed periodically. Some of these changes have been necessary and some appear questionable. Many of the changes have caused problems for the states which have tried hard to meet the original requirements.

The Fiscal Year 1982 Report which will be prepared next year has been reduced drastically. Some of the changes are beneficial and some will cause hardships for states presently in full compliance. Fortunately, these states in full compliance are probably most able to make adjustments.

ISSUES

General

At first glance it seems that there is a large number of VEDS issues. An examination of the issues, however, reveals that there are only three central concerns. These are cost of data, use of data, and the accuracy of data.

Cost may be the most critical issue. State and local officials are concerned about resources being taken from student-oriented services for use in the reporting process. Balanced against this concern is recognition of the need for management information.

Use of data, therefore, becomes the second major issue. If data is not used, it should not be reported. Put another way, only data with a clearly specified and legitimate use should be reported to higher levels of government. Acceptable use involves using the data in a predefined decision-making process with logical action taken as a result of the decisions. For example, data could be collected to evaluate programs under a structured formula and to shift funding based on the results of the evaluation. At this time, local institutions and state agencies are not aware of a comprehensive Federal Data Use Plan.

The third area or issue—data accuracy—evolves from the second issue. If the data will be used for meaningful decisions, it should be accurate. Accuracy of data in any system requires operational definitions, usable procedures, and a reasonable reporting format.

Cost of data

Many people have studied the cost of VEDS. An examination of the information available indicates that nobody really knows what VEDS costs. Estimates run from a few dollars per student to over fifty dollars per student. An unbiased systems analyst has estimated the cost at between eight and ten dollars per student. This cost would cover all data required, which includes enrollment, completion, follow up, and fiscal data. An underlying assumption of this cost estimate would be that local institutions presently maintain data bases necessary for efficient management at the local level. Such local data bases include program data, cost accounting data, student data, and staff data.

The Federal share of VEDS data costs varies from state to state. Some states would collect the entire data base without the Federal mandate. Some states would not collect anything without the Federal mandate.

There are several factors which can, and have, increased the expected costs of VEDS. The first factor is changing requirements or definitions. This, of course, causes changes in system design up and down the line.

For example, assume that the definition of Handicapped was changed. Local institutions would modify their data collection instruments. They would then train counselors in the use of new forms. Finally, systems analysts would change computer software and modify old files to fit new formats.

States would change data reporting formats, forms, and computer software. Local personnel would be retrained and persons with political involvement, including some members of the legislature, would be briefed.

The second factor which can increase costs is the collection, maintenance, and reporting of almost duplicate data elements. It is not unusual for a student's school record to have a major area of study defined by three, four, or more different codes, e.g., an institution code, a HEGIS Code, a VEDS Code, a CETA Code, etc. It is common for the same student to be subjected to two or more different follow-up procedures with different time frames, e.g., a Veterans' Administration Follow-up, a VEDS Follow-up, a CETA Follow-up, etc. Some administrators feel that this tpe of duplication not only costs more than necessary but undermines their credibility with students. A single system for data collection covering all occupational training is a way to both improve data and reduce costs.

A third factor which is associated with high costs is the sheer size of the data bases which are collected, maintained and reported. An average state will collect and process about 200,000 records every year. Each record will average about twenty data items. Each item will average about six characters. This totals about 24,000,000 characters in each year's data base requiring about 50,000,000 data enter strokes. Simply typing the annual VEDS report from computer printouts will require about 80 hours. There are about 30,000 data cells on the forms, with hundreds of totals.

How do these figures relate to increased costs? In one state, data entry costs increased 100 percent betwen 1979 and 1980. Forms costs increased by 50 percent during the same period. Finally, machine and personnel costs increased by more

than ten percent. State agency costs increased from $150,000 to $190,000 that year. Local cost increases were not measured.

To a state or local administrator, these figures and facts are often staggering. The budget may have increased slightly, but the data burden costs are not restricted to slight increases. Frequently the services being examined in a report are cut back due to the cost of the report.

Use of data

As mentioned previously, state and local people are not aware of any Federal Data Use Plan. Without such a plan, local administrators are worried about four critical, unanswered questions. These questions are:

1. Will the data be used?
2. If the data is used, will it be used in a logical manner?
3. What decisions will be made from the use?
4. What actions will result from the decisions?

Given answers to these questions, the quality of any data system will improve significantly. Local and state officials can see the importance of the reporting. When established, Data Use Plans have had remarkable, positive impacts on data collection systems. The experience of one state should demonstrate this point.

The state legislative had required a system similar to VEDS for over ten years. Quality of data had improved in the initial years of operation but had reached a plateau. In 1978, the legislature was faced with limited resources and a demonstrated need for change in the vocational program structure across the state. Many people felt that it was time for some realistic management actions.

A footnote was attached to the state appropriations bill which required administrators to develop a system for closing programs which were performing poorly. The resources saved would be available for programs which were successful or for new programs designed to meet new needs.

A cost/effectiveness model or formula was developed. Data reported by each program was evaluated and the program was given a cost/effectiveness performance score. The lower twenty percent of all programs (relative to the performance score) were visited for a process review. Suggestions for improvement were made. When programs improved they were taken off a probation list. When programs failed to improve they were closed.

In the second year of operation 35 programs had been closed, 37 were on probation, and hundreds had improved. Almost everyone in the state who was associated with vocational education was interested in the accuracy of the data. Almost nobody in the state questioned the need to report accurate data.

Controversy had shifted to the contents of the model or formula. The criteria included completion rates, placement rates, the percent of minority served, the percent of handicapped served, the percent of disadvantaged served, the sex balance, and the cost per full-time equivalent student.

Given the impact of the data, most local administrators made sure it was accurate before it was submitted. Further, they paid serious attention to the factors which were included in the formula. Service to the disadvantaged and handicapped has improved. Sex balance in the programs has improved. Local administrators are more sensitive to program competion and placement rates, and the cost of a program has become a very serious issue.

This evaluation process and associated data system contained what many systems analysts would feel are the ingredients for a meaningful management process. First, the need was evident. Second, the date definitions were clear. Third, there was a clear decision process for use of the data. Fourth, action was taken on the decisions.

This particular data use plan is probably not appropriate at the federal level, but the example does demonstrate the value of a plan.

Accuracy of the data

Decisions based on bad data are probably as detrimental to the public good as decisions based on no data. VEDS has accuracy problems. They are not monumental or unsolvable problems, but they do affect data quality. From a strictly head-count perspective, or gross dollar perspective, the data is probably very accurate. When a clearly defined variable is inserted, the data suffers slightly. When difficult-to-obtain variables are inserted with good operational definitions, the data deteriorates more. When variables with subjective definitions are inserted, data quality suffers significantly. When variables based on subjective opinion which are biased by outside factors are inserted, credibility becomes nonexistent. VEDS has examples of all of these cases.

A good example of a data item that is probably well reported is enrollment by program type. States have been doing this type of reporting for many years, and

everyone in vocational education is familiar with program classifications. There are, of course, areas of confusion such as courses versus programs, students enrolled in more than one program, academic versus vocational students in the same course, if not in the same program, etc.

The introduction of level of training as a variable confuses the picture slightly. Adult students, for example, frequently take a course in a postsecondary program and are not identified as adults. Further, state and Federal definitions of adult and postsecondary do not always correspond to VEDS definitions. Still, the data on a whole is accurate.

A variable like sex of the student is easily observable and does not create accuracy problems on a large scale. Disadvantaged and handicapped definitions, on the other hand, are not easily observable and do introduce error. This is true even though these variables are well defined in VEDS. The operational definition of a handicapped student at the secondary level, for example, is a student with an "Individualized Educational Plan" on file. These plans are mandatory for handicapped students at the secondary level.

The introduction of an expanded variable such as type of handicap causes administrators to examine each Individualized Educational Plan for data, since this type of information is not usually kept on computer files. There could be several hundred of these files at any given school.

A data item like Limited English ability is extremely difficult to obtain under what can only be described as a subjective definition, i.e., "Limited English Proficiency (LEP) refers to persons of a national origin minority who do not speak and understand the English language in an instructional setting well enough to benefit from vocational studies to the same extent as a student whose primary language is English."

This type of item introduces significant error into the system.

The employer evaluation part of VEDS is only slightly better than worthless and certainly not worth the money spent. The data is influenced by the student's personality, the employer's mood, the employer's reluctance to criticize anything in writing, and many other external factors. In Colorado, in 1979, for example, only a very few former vocational students in the whole state were unsatisfactory, if the employer data can be believed.

Summary

In summary, data is expensive and should be collected and reported only when there is an identified use. Therefore, a Data Use Plan at the Federal level would be helpful in two ways. First, it would identify that data which is necessary, and, second, it would demonstrate the importance of the information. VEDS should be modified to serve the Data Use Plan. Special studies using a national sample could be conducted to answer special questions.

Since information that is used for decisions should be accurate, all VEDS definitions must be clear, precise, and easily usable. If an item is so nebulous that it can't be clearly defined, it shouldn't be collected.

Duplication of items because of slightly different definitions is very expensive. Duplication of reporting is also expensive. Elimination of duplication could improve reporting significantly.

There should be specific language in Federal legislation which funds data collection. This would clarify the importance of information and relieve pressure on local and state officials who now must assume the responsibility for allocating funds to this effort at the apparent expense of student oriented services.

Finally, states should have the responsibility for data reporting to the Federal Government. Aside from the political reasons for this recommendation, local reporting to the Federal Government would duplicate state efforts conducted in behalf of state legislatures. A second negative effect of local agencies reporting directly to the federal government could be the fracturing of state coordinated planning which is based on data.

Thank you for your attention during the past few minutes. At this time I would be happy to answer any questions you might have on this topic.

Chairman PERKINS. Let me thank you very much, all of you, for your appearance here this morning. You have been very helpful, and you will be very helpful to the committee when they read your testimony.

Today marks our 49th day of hearings on all the educational programs this year. We plan on holding other vocational educational

hearings in January and some in February, some here in Washington, others in the field. We may hold hearings through March and April. I am concerned as much as anybody about getting the Vocational Education Act extended next year, but at the same time I have been here long enough to see a lot of pitfalls ahead of us.

I think I would be derelict in responsibility, judging from the past, if I moved a vocational education bill ahead of the reconciliation bill next year, especially since Mr. Stockman has asked Secretary Bell to cut back the program from $800 million down to $500 million. We are going to get to the point where this wonderful program would be torn to pieces if that were to happen.

And if that happened I don't think any of you would want to see a bill go on the floor next year where they could then destroy the good aspects of the bill. You may think they won't. I thought we would carry that reconciliation bill, the so-called Gramm-Latta, by 12 to 15 votes. Instead we lost it last June.

I think we should get ready to move a vocational education bill expeditiously after the reconciliation vote next year. We've got to build a devil of a lot more support than we have at the present time, or we'll get cut to pieces on the floors of the House and Senate.

Before we take a vocational education bill to the House floor I want us to get a good group together, and help me make this decision immediately after the reconciliation fight. We ought to have this group together here before this reconciliation fight next year in Washington and have them alerted. Some of the States may not be able to make up for the Federal cutbacks that are being proposed. Then we will lose many of our training programs in many States. We will see a great program, one of the greatest programs in the world disintegrate.

So we have a lot of problems facing us in the future and we must take them all seriously. I have been here long enough and I have watched it happen. I said, well, they won't tear down CETA. They destroyed CETA.

The mayors came up here, and they were singing a good song to the White House. They played more beautiful music when the county officials came up here last year. But after they left we had no support in the U.S. Congress for CETA, and you see what happened.

And then all the community services people came to see me. I tried to tell them last year in January what they had better do. But instead, they came in here in great masses in June and July. I told them they were just too late.

We cannot get caught in our shirttails next year, because if we don't do the work on the members and if they cut this program back to $500 million in the reconciliation process, your program is going to be torn apart.

And I am not going to let them monkey with the figures at that point on the floor of the House. At that point I'd get awfully stubborn, after they do that much to us. I'd take a chance on the next election, because the Vocational Education Act is extended through 1984.

So let's none of us be too egotistical about next year. Let's play the game for all it is worth. We had problems in authoring the

original bill in 1963. We had a lot of disputes between the Department of Labor, the Department of Education; Jack Kennedy, who was President at that time, told me to beat their heads together some way. I put a fellow in the conference by the name of Jim Patton, from Frankfort, Ky.

We finally got it all reconciled between the Departments. So I have seen some stormy days, and a lot of people would have thrown in the sponge at that time, what with the disputes between the Departments. But I did not, and I want to make sure that we all hold fast to all of our gains and not dissipate them. You can get fooled on the floor mighty easily.

When I took over the chairmanship of this committee in 1967, I had all the count against me on the Economic Opportunities Act. They said it was impossible, but I worked that whole fall, State by State, got enough commitments out of the South, the Midwest, and the West, until I knew the bill would float. And then I moved it and we made progress with it.

I carried a little book around with all the members from the various States and marked them off every night, for 90 days, so I have had a little experience at these things.

Let's get ready for this reconciliation fight. I am telling your leaders now that this reconciliation fight next year should be our first priority. If we lose that, Carl Perkins won't bring any bill out next year. He will wait until the 1982 elections are over with. I'd like to move this bill next year as much as anybody, as much as any of your leaders, but that depends on our success in fighting this reconciliation battle next year.

If we lose that we will take no chance, my friends. We will take no chance.

Let me compliment all of you here for excellent testimony this morning. We will work closely together the remainder of the year and closely together next year. Throughout we will have a considerable number of hearings, and we will try to let your leaders help us get in representatives from all sections of the country. When we do go to the floor, we must be pretty much united. We can't have the junior colleges fighting the secondary vocational people. We've got to get together on this thing. We got together a few years ago and we can do it again in the future.

But let's concentrate on this reconciliation process, because if they demand a $300 million cut out of this program you can imagine what it is going to do to the program. Let's get prepared for that, bring the witnesses in here and let them state what effects such a cutback would have.

It's going to be the fight of our lives, but it's not a fight that we can't win. We can win it, I think.

And I think some of our friends that voted wrong this year will be a little bit more skeptical next year about destroying a good program that's helping all of America, especially when we are not going to balance any budgets. If we destroy this program, it is going to create greater deficits in years ahead.

Those are some of the things that we would like you to go back and think about.

Now it appears to me this administration may be in favor of elimination of the Vocational Education Data System. I'd like to

ask Dr. Senese whether the administration is endorsing continuation of VEDS in a much reduced form and why?

Dr. SENESE. Mr. Chairman, presently the administration is reviewing the VEDS system and no decision has been made yet on it.

Chairman PERKINS. What's that?

Dr. SENESE. Presently the administration is reviewing the VEDS program, and no decision or recommendation has been decided upon.

Chairman PERKINS. You don't yet have any recommendations along this line?

Dr. SENESE. No; I do not.

Chairman PERKINS. I don't want to ask you to talk about budgets or anything like that because you are not in a position to talk about the budgets, are you?

Dr. SENESE. No; I am not.

Chairman PERKINS. Well let me compliment all of you, all of you distinguished gentlemen this morning. You have been most helpful to the committee. I wish all of our members were here. But you will not have greater cooperation from anyone than you well from Carl Perkins. I thought we all should be alerted about the future, about those who want to cut back this program beyond the point of no return.

Let me thank all of you.

[Whereupon, at 10:47 a.m., the subcommittee was adjourned.]

[Material submitted for the record follows:]

MAJORITY MEMBERS
[illegible]

MINORITY MEMBERS
[illegible]

CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
COMMITTEE ON EDUCATION AND LABOR
SUBCOMMITTEE ON ELEMENTARY, SECONDARY, AND VOCATIONAL EDUCATION
[illegible] RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, D.C. [illegible]

December 28, 1981

Honorable Terrel H. Bell
Secretary
U.S. Department of Education
Washington, D.C.

Dear Mr. Secretary:

During our Subcommittee hearing on the Vocational Education Data System on December 10, the Subcommittee members were unable to ask all of the questions we had wanted, due to time limitations. I am therefore submitting two additional questions, to be answered for the hearing record.

Our questions are as follows:

1. Is the Administration in favor of the elimination of the Vocational Education Data System, or are you endorsing its continuation in a much reduced form? What is your justification for your position?

2. Dr. Donald Senese testified on December 10 that the Department is cutting back on data collection so that the burden at the State and local levels will be reduced by almost 50 percent. I would like to congratulate you for finding a way to cut back. However, I would like to know what types of information will be available in the future from the reduced collection and if it covers all the data collection requirements delineated in the authorizing legislation. Will this new round of data collection be any more useful or meaningful at the local and Federal levels than what is collected now?

We would appreciate receiving the Department's responses no later than January 12. I appreciate your cooperation.

Sincerely,

Carl D. Perkins
Chairman

THE SECRETARY
WASHINGTON, D.C. 20202

[illegible] 1982

The Honorable Carl D. Perkins
Chairman
Committee on Education and Labor
House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

I appreciate the opportunity to provide you and your subcommittee with additional information regarding the National Vocational Education Data System (VEDS).

Your first question concerned the Administration's position with respect to the reauthorization of VEDS. As Dr. Senese indicated in his testimony on December 10, 1981, we are currently taking a comprehensive look at VEDS, and at this time no final decision has been made concerning the reauthorization of VEDS.

Your second question concerned the scope and impact of the changes in VEDS which the Department has instituted for the current (1981-82) data collection year. These changes consist entirely of suspensions of certain portions of the previous (1980-81) data collection system. As NCES began to study the returns from the first two years of operating VEDS, it became evident that certain portions of the system were not only perceived by the States as excessively burdensome, they were also providing data of low reliability and utility. Therefore, working with the cognizant portions of the Department, NCES identified these portions of VEDS as ones that could, consistent with the mandate of the law, be suspended until further study and redesign of the system takes place. Such study and redesign is now going on, but we expect that these suspensions will remain in place at least for the next (1982-83) data collection year.

I can sum up the suspended portions of the data collection as follows:

1. Teacher/staff data: these data are stable due to the lack of staff changes from year to year.

2. Employer follow-up data: these data also change very little from year to year.

3. Program leaver and follow-up data: these data exhibit a low return rate and are expensive.

4. Certain enrollment and finance data: definitional problems in the special needs areas make collection of these enrollment data difficult; some finance data which was difficult to collect were suspended.

Since the suspended portions of VEDS are those which the States have found least reliable and most burdensome, these suspensions result in major burden and cost reductions and leave the remainder of VEDS improved as to reliability, utility and meaningfulness. We estimate these changes will reduce the man hours approximately 48 percent, from 198,000 hours to about 102,000 hours annually.

The precise content of VEDS, by year of data collection, was summarized in the Supplementary Paper submitted with our December testimony, pages 15-18.

If you have any further questions, I will be most happy to respond.

Sincerely,

T. H. Bell

NORMAN Y. MINETA
MEMBER OF CONGRESS
10th District, California

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April 15, 1981

The Honorable Carl Perkins, Chairman
House Education and Labor Committee
2181 Rayburn House Office Building
Washington, D.C. 20515

Dear Mr. Chairman:

Enclosed are two brief statements concerning the reauthorization of the Vocational Education Act which I respectfully request be included in the official hearing record on this matter.

Both statements were submitted to me by community college administrators in my district and concern, specifically, the Vocational Education Data System.

Your assistance in this matter will be greatly appreciated.

Sincerely yours,

NORMAN Y. MINETA
Member of Congress

NYM/sjd/w
Enclosure

90-876 77

THIS STATIONERY PRINTED ON PAPER MADE WITH RECYCLED FIBERS

TITLE: VOCATIONAL EDUCATION DATA SYSTEM: ITS IMPACT ON THE LOCAL COMMUNITY COLLEGES AND THEIR VOCATIONAL PROGRAMS

PREPARED BY: FOOTHILL-DE ANZA COMMUNITY COLLEGE DISTRICT
OFFICE OF EDUCATIONAL SERVICES, VOCATIONAL EDUCATION
ROBERT W. WALKER, ASSISTANT DIRECTOR

PURPOSE: USE BY THE OFFICE OF NORMAN Y. MINETA, MEMBER OF CONGRESS, AS TESTIMONY FOR THE HEARING RECORD BEFORE HOUSE EDUCATION AND LABOR SUBCOMMITTEE ON ELEMENTARY, SECONDARY AND VOCATIONAL EDUCATION DURING DELIBERATIONS RELATING TO THE REAUTHORIZATION OF THE VOCATIONAL EDUCATION ACT.

DATE PREPARED: MARCH 16, 1981

Funding to our District under the provisions of the Vocational Education Act has increased very modestly over the eight year period from 1972 to 1980. The actual dollar increase has been $44,000 (from 270,000 to 314,000). This represents an overall 16.3% increase or 2.03% per year. During the same period cost of operation for the District has increased by 78.14 or 9.76 yearly. It is evident that the ability to support, expand and/or improve our vocational programs through the use of these Vocational Education Act funds has been significantly reduced even as student enrollment in these areas have increased. (To have maintained our position relative to 1972, the VEA allocated funds for 1980 would have had to be near $481,000.) This apparent $166,000 shortfall has had a dramatic effect upon our ability to support our vocational programs. Discussions with other community college district's vocational administrators in our area indicate very similar historical funding patterns.

Concurrent with these relative fiscal reductions we in the community college sector are faced with the necessity of maintaining "state of the art" technical programs in occupational areas in which equipment and processes become obsolete within exceedingly short periods. A significant local industry demand is placed upon our campuses to train, upgrade, and retrain personnel in electronics, data processing, and the health fields. Each of these areas has in the last eight years demonstrated technologic development which severely strains our ability to maintain programs at an equipment level which is close to the employment environment our students face upon program completion. Tax reforms in the state have also had a tremendously limiting effect upon our ability to initiate or revise an "equipment or personnel intensive" vocational program. The necessity for continued and increased "real dollar" assistance to these programs is to vocational educators real and dramatic.

Of significant administrative concern over these same years has been an ever increasing "reporting function" required under provisions of the VEA act and other vocational related regulations. The "reporting" requirements in 1972 were essentially directed to fiscal accountability and demonstration of maintenance and expansion of effort. The required report preparation was consistent and compatible with our existing records and fiscal accounting systems. The cost of preparing these reports could be described as modest and certainly the time, effort, and personnel committed, in our district, did not exceed $17,000 or 6% of the allocated VEA funds. Recently, the increased complexity of the student and faculty characteristics profile reporting requirement has added significantly to the effort required for compliance. Major adaptations and redesign of

registration procedures, classroom reporting mechanics and data processing designs have been required. Increased data collection, processing, and storage has been necessary. The direct cost of VEA reporting for purposes of accountability probably now exceeds $45,000 or 14% of the allocated funds.

Compliance with the new reporting requirements of the Vocational Education Data System mandated by PL 94-482 and developed by N.C.E.S. will produce a dramatic increase in the local, state and national cost of vocational education reporting. The specificity of the data requested and the imposition of student and employee follow-up procedures will locally require major changes in registration and program operation, as well as, the development of entirely new follow-up procedures. The net result could be an increase in reporting costs locally which may reach $30,000 and bring our administrative burden for all VEDS and VEA related reporting activities to $75,000 or 24% of our allocated funds. It has been estimated that VEDS will impose $5,000,000 of additional costs upon the responsible schools and agencies in California.

Vocational Educators have repeatedly expressed the following reservations and concerns in respect to the Vocational Education Data System (V.E.D.S.):

1. VEDS will not answer the basic questions asked by Congress in regard to Vocational Education.

2. The specificity required by VEDS is greater than can be utilized on an aggregated national level.

3. The validity of the results are questionable when aggregated at the national level as required by VEDS.

4. The aggregated results will be clearly subject to misinterpretation.

5. The cost imposed is excessive at the local and state levels.

Although the VEDS student enrollment report may eventually be perfected to provide NCES with reasonably accurate information on student enrollments, its usefulness will have serious limitations, due to data collecting problems at the local level. The usefulness of the VEDS student enrollment data diminishes, the farther it is removed from the local district sites. The quality of state and federal level data is dependent on the quality of the initial data collected at the local level.

The Employer and Student Follow-up VEDS reports will not, in our opinion, accurately, or effectively, report representative data on community colleges. This portion of the VEDS system presents biased, skewed, and potentially misleading data and is not a reliable basis for planning. Periodic regional studies of program effectiveness and formal assessment of this effectiveness by polling of local advisory committees, industrial and commercial agencies, and other community agencies would produce more reliable and valuable assessments. The National Policy committee for VEDS has unanimously recommended that NCES abandon the proposed employer follow-up system--substituting if necessary, feedback information from employers by way of program advisory committees. NCES to date has made no change.

It is clear and desirable that fiscal accountability and compliance documentation must be maintained. It is our opinion, that if:

a) funding levels had been maintained near the real dollar values of 1972,

b) reporting requirements for vocational education from all federal and state agencies were requested in similar formats and utilized common data,

c) the reporting requirements under the Vocational Education Data System (VEDS) were not imposed

the ability of the institution to support and improve its vocational programs would be increased even if the allocation totals were modestly reduced.

The reauthorization of the Vocational Education Act currently under way is being critically watched. If the result is the strict adherence to VEDS reporting requirement or the imposition of any similar complex system, without major increases in funding levels, the educational sector's ability to serve industry through effective vocational education will surely be adversely affected. It is our opinion that the goals and objectives of the Vocational Education Act and the necessary compliance and accountability documentations could be best accomplished by eliminating all provisions of V.E.D.S. and returning to the reporting procedures previously in place.

EVERGREEN VALLEY COLLEGE

CONCERNS REGARDING THE

VOCATIONAL EDUCATION DATA SYSTEM REPORTING REQUIREMENTS

Our community college serves hundreds of vocational students annually. The VEDS reports are extremely complex. There is literally no way in which VEDS reports, as presently constituted, can be completed without extensive data processing assistance. The data processing programs which we need do not exist. They will have to be conceptualized, written and pilot tested before they can be used. The process will take several months. In the meantime, we are required to provide data which we cannot yet obtain. We are being asked to identify, follow-up and report on 16 different categories of students--a monumental task. We are being asked to provide wage and salary information, by instructional program, within a standard occupational classification, subjectively. This process is both redundant and meaningless.

An employer follow-up of former students is also required. From experience with similar prior projects, both former students and current employers strongly resist giving out this type of information. Both groups are concerned with and support the right of the employee to confidentiality.

These brief comments are intended to convey that the VEDS data requirements, which might be considered desirable information, are almost literally impossible to obtain. The VEDS reporting requirements and data collection instruments concomitantly required are poorly conceived and improperly designed.

We urge that the VEDS requirements be drastically modified, to meet the concerns outlined above.

GSO/gaa
3/3/81

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Executive Director
WILLIAM F. PIERCE

December 23, 1981

The Honorable Carl Perkins
Chairman
Committee on Education and Labor
U.S. House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

Enclosed is a position of the Council of Chief State School Officers' Committee on Evaluation and Information Systems concerning the mandated Vocational Education Data System. We would appreciate the inclusion of this statement in the formal hearing record on the reauthorization of the Vocational Education Act.

As you are aware, the Chief State School Officers have complied with the legislative provisions of this mandate even though we had serious concerns over the size and accuracy of the proposed system from its early design. We have consistently requested changes and improvements in the system but feel that legislative requirements preclude the possibility of immediate relief unless recommendations included in our statement are seriously considered. Concern over this issue should not be construed, however, as a lack of willingness to be accountable for federal monies. We do support an acceptable Vocational Education Data System and stand ready to assist in the redesign of a system that will yield valid, usable data. The Council appreciates your consideration of those concerns and wish to convey a continuing admiration and support for your tireless and effective leadership in the cause of public education.

Sincerely,

William F. Pierce
Executive Director

WFP/gjs

COUNCIL OF CHIEF STATE SCHOOL OFFICERS
379 Hall of the States, 400 North Capitol Street, N.W., Washington, D.C. 20001 • 202/624-7702

STATEMENT OF THE
COMMITTEE ON EVALUATION AND INFORMATION SYSTEMS
OF THE
COUNCIL OF CHIEF STATE SCHOOL OFFICERS
(CCSSO)

Public Law 94-482 specified that a Vocational Education Data System (VEDS) be developed for the basic purpose of compiling descriptive statistical data on vocational education programs being operated throughout the nation. The rationale of developing a common reporting structure serving multiple agencies represented a concept that the Council of Chief State School Officers (CCSSO) endorsed and supported. As U.S.O.E. and N.C.E.S. began to define the parameters of the system based on legislative language and history, it became apparent that significant problems with burden, cost of implementation and state capacity to report were arising that would be difficult to address. During the past several years, extended deliberations and dialogue with N.C.E.S. have been maintained but sufficient resolution of the technical and administrative shortcomings of the proposed VEDS never reached the point that the states could recommend the system. Recognizing the expressed needs of Congress and the legal implications of the legislation, state and local agencies have expended vast fiscal and human resources for the purpose of complying with VEDS reporting requirements, and in many instances, have been unsuccessful in doing so. The severe fiscal constraints and increasing data burdens facing states at the present time should, hopefully, prompt some redirection in the reporting and accountability mandates placed on the states in the current legislation.

Two years ago the Council of Chief State School Officers' Committee on Evaluation and Information Systems (CEIS) developed a position paper which laid out, in detail the many concerns states had with respect to the VEDS reporting requirement. Some of those concerns have been able to be accomodated by NCES, and some have not. In some instances, modifications made in VEDS still do not correct the faulty premises upon which VEDS is based. Several of the major concerns with the VEDS legislative mandates are expressed below along with specific detail to relate policy to practice. Where possible, there are specific courses of action recommended to address stated concerns and we respectfully request that they be considered in a review of the legislation and resulting system.

I. Public Law 94-482 was drafted in such a manner as to provide funds for specific purposes that, in many cases, established new directions for vocational education programs. The developers of VEDS attempted to take old methodologies and procedures for compiling vocational education data (i.e. reporting student enrollment at a 6 digit level of detail) and make modifications to assess new program directions. As such, VEDS just "added on" additional requirements to an already cumbersome reporting process.

The most significant example of this practice is the adherence to the reporting of unduplicated enrollments in all parts of the system. NCES has insisted that all enrollments be reported at very specific levels of detail (6 digit USOE program codes) with no student reported in more than one program. When programs are described in very finite terms, the descriptions approach those of courses that comprise programs and the states and local education agencies have difficulties in accurately determining appropriate "program" classifications. This phenomenon is particularly true at the secondary level.

It is suggested that consideration be given to reporting some enrollment data in an unduplicated manner at a general level of program detail (e.g. seven or eight major program areas) and to reporting some of the enrollment data in a duplicated manner if more finite taxonomic detail is required.

II. Serious questions have been raised about the viability of student placement as an indicator of the effectiveness of vocational education programs. There is considerable concern over the use of this single-facted measurement to evaluate programs. The VEDS legislation continues, and enlarges, the reliance upon follow up statistical compilations both student and employer. The utility of follow up data at the state and local education agency level is far less than the emphasis that is placed on its collection at the federal level.

Time has shown that most follow up studies have significant nonrespondent biases and the data have limited utility. These types of data arrays should be deemphasized at the federal level and, more importantly, charged in periodicity. All current VEDS reporting requirements are annual. Why? Student follow up would be just as useful if it were collected every three years and employer follow up data could possibly be collected using sampling. In short, alternative methodologies, other than annual universe collections, should be considered for some of the federal vocational education information requirements.

III. Congress' intent to analyze manpower supply and demand has not been as successful as anticipated. No group or agency has been successful, to our knowledge, in developing a "system" that accurately relates these pieces of information and provide accurate measures of the occupational areas for which vocational education should provide training. Current VEDS requirements mandate analyses of follow up data according to Standardized Occupational Classifications (SOC's) which require a unit record (individual student) data base of enormous complexity.

The attendant inaccuracies of follow up data and matching jobs to instructional programs make the whole data base questionable for use at any level of government. The desired supply-demand analysis should not be driven by such inaccurate unidimensional measures. We respectfully suggest that these analyses and reporting requirements be removed from legislated mandates.

IV. Most categorical programs operated by federal agencies are guided by a hierarchical principle with respect to information collection and use. Local education agencies need more detailed basis of information than state education agencies; state education agencies need more detailed bases of information than federal agencies. The level of detail required in the P.L.94-482 legislation (as embodied in VEDS) far surpasses that required by most state agencies and in some instances, local agencies. This situation is the inverse of generally accepted data collection principles and the degree of utility these large data sets have at the federal level is questionable in comparison to cost and imposition of acquiring them.

In addition, the legislated VEDS reporting requirements mandate that vocational educators collect and report data that are in some cases inappropriate or unobtainable within the context of the vocational education program. In many states vocational educators do not have access to information on students handicapping conditions, language proficiencies or economic or educational disadvantages. Also many states do not maintain separate fiscal accounting structures for vocational education.

The National Center for Education Statistics (NCES), the Office of Vocational and Adult Education (OVAE) and the Office for Civil Rights (OCR) have attempted to "systematize" Congress' initiative to monitor access to programs by partially using VEDS as a vehicle for the data collection efforts. While the consolidation of reporting activities is usually a laudable concept, the reporting of race/ethnic data and special needs data (i.e. disadvantaged, handicapped, limited English proficiency) have become annual reporting requirements in VEDS at the most specific level of detail.

In the instance of race/ethnic data, this mandate should be left with OCR and collected on a periodic basis, as deemed necessary to meet Congressional intent. It is anticipated that the level of detail for this data collection would be greatly reduced and still provide usable "first cut" information for OCR purposes.

The collection of special needs data should be assigned to other units within the Department of Education having responsibility for the service being provided. That is, the Office of Special Education should have the responsibility for determining the number of handicapped students being served in vocational education, the agency responsible for monitoring Chapter I (of the Consolidation Act) should have responsibility for determining the number of disadvantaged students served, and data on limited English proficiency students collected in a like manner. The key issue is that vocational education services to these students are secondary to the services provided to address a special education need, and typically information about the special needs resides with those responsible for meeting those needs.

The intent of the enactment of the Vocational Education Data System was to consolidate reporting requirements and reduce reporting burden by developing a "single data base" which could be accessed by many users. That data base, however, encompasses certain types of information not germane or obtainable by vocational educators. As a result, state local education agencies, are required to collect and maintain some types of data in a vocational education context as well as a special needs program context. Nowhere is this problem exacerbated more than in the area of fiscal accountability. State and local agencies, as a rule, do not maintain separate fiscal accountability systems for vocational education. However, the federal fiscal reporting requirement for vocational education requires the establishment of data sets that are in excess of those needed to be maintained for other federal fiscal reports. There is little evidence at the federal level that fiscal accountability for vocational education should be expanded from that required by other federal programs.

In future legislation, vocational education reporting mandates should be coordinated with other federal reporting mandates to insure that, where possible, data are generated by the most appropriate sources.

V. Severe definitional and infomation management problems have resulted from the continuances of data collection strategies that prevailed prior to the enactment of P.L. 94-482 plus additions needed to address the new directions set forth in that law. Some states are operating three separate data collection systems to comply with all VEDS reporting requirements (Secondary, Adult, Postsecondary) due to the fact that the delineation of the types of agencies offering vocational programs has become too prescriptive. In addition, VEDS has attempted to address the general statistical requirements of the program units within the Department of Education and the compliance information requirements of units within and outside the Department. This "Single, Central Data Base" approach to data collection is not, in this case, easily facilitated by state and local education agencies. Program assessments and compliance issues are, at times, at cross purposes and common data sets are not realistic. P.L. 94-482 currently requires the compilation of huge data sets for annual state plan and accountability report updates in addition to the massive volume of data required in VEDS. If the state plans and accountability reports are to be retained in future legislation, states should be excused from comparable data reporting requirements in other sections of the legislation. Where data sets can be used for a variety of purposes, the data should be collected one time and disseminated internally as appropriate. New legislation should endorse these concepts in spirit and practice.

VI. Congress should give due consideration to using fewer, more accurate benchmark statistics for the oversight of vocational programs. The legislation should coordinate reporting requirements with the programmatic issues addressed by the act, even if it is at the expense of curtailing traditional data collection activities.

In summary, many states will expend more dollars per participant for the collection and dissemination of information in vocational education programs than for any other federally subsidized educational program. This expenditure is not consonant with the very small percentage of the total cost of vocational programs supported by federal monies. States are willing and expect to be held accountable for the use of federal revenues, as they are held accountable for state revenues, but the accountability must be held in proportion to the magnitude of federal support.

Coast
Community
Colleges

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January 7, 1982

Honorable Carl D. Perkins, Chairman
Subcommittee on Elementary, Secondary, and
Vocational Education
B-346C Rayburn House Office Building
Washington, D. C. 20515

Dear Congressman Perkins:

The American Association of Community and Junior Colleges and my colleagues in California appreciate the opportunity to further clarify our position regarding the Vocational Education Data System (VEDS). In the testimony on December 10, 1981, I stated that:

> "The Vocational Education Data System does not provide meaningful or useful data at the local, state, or national levels."

This statement has been generated based on experiences which were reported in the presentations of Dr. James Harris and Dr. Donald J. Senese at the hearing and have also been experienced in California. Just to reinforce some of the concerns, it should be noted:

- Federal data has been aggregated. When you get reports on placements, leavers, and completers for an auto program you are getting data on the secondary and the postsecondary program. It is neither conclusive or valid to compare programs which may be two years in length with courses which are 18 weeks in length or to compare people of different ages.

- Potential returns on the Survey Group. In the secondary programs, students tend to stay close to home for the first year after graduation, allowing for a potential of 30-40 percent return. That is acceptable but not outstanding. In the postsecondary system, the population is very mobil making the survey return average about 12%. No one can draw real conclusions from that size return.

- Reporting the Data Back. I have been in education for twenty one years. During that period of time I have yet to see any data reported by one of the districts I have worked for returned to the districts for management use. This data disappears into the woodwork. When we collect data at the local level, that information is given back to the colleges in its reported form so the management team can evaluate it and make changes.

- Repetition of the Data Requests. The Federal Government has one set of requirements for reporting on programs for vocational education and another set for the Office of Civil Rights, etc. It is difficult, time consuming, and non-productive to collect the data, particularly when the requests all come in at different times.

- Employer Information is Useless. Taking into account the current requirement has been suspended, that requirement was a voluntary one on the part of the student. At least in our district, less than 5% of the students chose to volunteer employer information and less than 12% of the employers from that 5% reported any data. I contend that this was typical of the data in California, and from a research standpoint in making inferences, assumptions or conclusions, it is useless.

You have asked if the American Association of Community and Junior Colleges would recommend repeal of the VEDS requirements, or if a simpler way exists for gathering more useful data.

Both the National Association and the California Community Colleges would recommend that the following principles guide any implementation of Federal data gathering efforts which are mandated by legislation:

- A direct quote from the adopted legislative position of the California Community and Junior College Association on Federal Vocational Education states:

  "9. Develops and Implements Reasonable and Meaningful Accountability Requirements: While accountability is an important and reasonable requirement of Federal funding, the process should contribute only necessary and useful data which will assist local, state, and federal agencies with information for the improvement of vocational programs. Such processes must be at a reasonable cost to local agencies or supported through the funding source."

  Taking this policy recommendation into account, the California Colleges and I presume AACJC would endorse the recommendations which were placed into testimony by the American Vocational Association which include:

  - A data use plan should be developed at the Federal level. This plan should identify the goals and/or objectives where achievement will be measured, how achievement will be measured, and the data necessary for measurement. (We would amend this to assure state and local acceptance of that plan and limit the plan only to the necessary data, i.e., are students placed in an area whey they are trained and are employers satisfied with the training.)

  - Only data that are needed for national decision-making will be collected in the basic data system at the federal level.

  - Every data item in the system should be operationally defined. For example, a disadvantaged student is operationally defined as a student who qualifies for financial aid under an economic need program. (We would recommend that these operational definitions be limited in scope to areas which can realistically be collected.)

  - Federal reporting systems concerning occupational training activities should be consolidated and limited to essential and necessary data. At a minimum, federal requirements for data should be definitionally consistent across the various federal reporting systems.

- There should be funding specified for data systems.
- States should have the responsibility for collecting data from local agencies and institutions and reporting to the Federal Government.
- Sampling or special studies should be used for other special data needs not covered in the basic data system. (California would amend this recommendation to include that sampling be used for the basic system requirements where it is more feasible and will maintain validity and reliability of the data.)

In addition, the association recommendations would include:

- Employer satisfaction requirements should not be a part of the basic data requirements and should be a defensible system developed by the state and established in the state plan for vocational education with evaluated conclusions or information reported to the state and the federal government.
- Any data which is reported to the State or Federal Government in compliance with legislation should be reported back to the local agencies to be used for management purposes.
- Each state in its state plan should develop a comprehensive accountability system including evaluation of the program and each state would be approved by criteria established by the Federal Government. Basic responsibility for accountability and implementation of such a plan would remain with the state.

This is a long way to reply to the initial policy statement which the CCJCA condensed to one paragraph; however, I hope this extended response will show that AVA and AACJC are basically in accord and working together on the issue of accountability.

Sincerely yours,

Donald F. Averill, Vice Chancellor
Educational Planning and Vocational Education

kh

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STATE OF COLORADO

State Occupational Information Coordinating Committee (SOICC)

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Member Agencies:

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Division of Commerce and Development

Division of Employment and Training

Division of Occupational Education

Division of Vocational Rehabilitation

January 22, 1982

The Honorable Carl Perkins
U. S. House of Representatives
2328 Rayburn Building
Washington, D. C. 20515

Dear Mr. Perkins:

Thank you for your letter dated December 28, 1981. I would be most pleased to answer your question which was:

> "(Does) the American Vocational Association feel that Congress should repeal the requirement for VEDS, or whether Congress should find a way to cut down on the data collection and make it more meaningful?"

The American Vocational Association recommends the latter alternative. Congress should require states to submit a limited data base for program planning, monitoring, and evaluation.

This data base should cover programs which are under the jurisdiction of the State Plan for Vocational Education. It should contain information on the enrollments in all programs. The programs should be classified into two types: those which are designed to impart entry-level skills and those which are not designed to impart entry level skills. Data about both types of programs should be reported at a two-digit level. Furthermore, enrollments should be categorized by program, and sex. The categories of handicapped and disadvantaged should be eliminated.

Data about numbers of completers should be obtained from all programs and should be categorized by program, and sex. The employer follow-up should be eliminated. Follow-up data on completers should be obtained from states on a sample basis once every three years. To supplement this sample data, a national longitudinal study of secondary and postsecondary completers should be conducted. This study would focus upon:

1. The completers' enhanced satisfaction with their occupational choice;
2. The completers' increased occupational knowledge and skills;
3. The placement of completers' in employment; and
4. The potential utility of the completers' skills in the workplace.

The duplication in accounting procedures which currently exists between VEDS and GAPA (section 406-A) should be eliminated. Institution specific accounting data should be acquired through a special study.

We feel that this scaled-down version of VEDS will strengthen and improve the reporting system. It will help to make the data more accurate, meaningful, and useful for decision making purposes.

Thank you for allowing us to testify and thank you for the friendly, yet effective way you conducted the hearings. I, personally, value the experience and look forward to a good vocational bill developed by the subcommittee under your leadership.

Sincerely,

James L. Harris
Director

JH/eb

The Commonwealth of Massachusetts
Cape Cod Community College
West Barnstable 02668

Office of the President

TELEPHONE 362-2131
362-2132
362-2133

August 26, 1981

The Honorable Gerry E. Studds
1501 Longworth House Office Building
Washington, D.C. 20515

Dear Representative Studds:

The existing Vocational Education Data System (VEDS) reporting requirements are extremely costly, time consuming and complicated. Compliance with these requests is especially cumbersome at the community college level where students often do not declare majors until at or near the time of graduation, and non-attendance for one or more semesters does not necessarily imply that enrollment has ceased.

As the Federal Vocational Education Act (Public Law 94-482) is currently undergoing reauthorization hearings and VEDS requirements were promulgated as a result of the present legislation, reauthorization should simultaneously address lessening these data requests.

No additional funds were made available to develop data systems to support VEDS requirements. Although efforts have been made to increase the interfacing of VEDS, HEGIS, VA, and OCR reports, one survey should be developed and implemented at the federal level to collect all required information simultaneously.

In the interest of both more accurate reporting and more efficient data collection, the following areas of the present system need changing:

Although the state to federal expenditure ratio is in the order of 10 to 1 (not 1 to 1) we are asked to report on all programs. Detailed reporting requirements already exist for tracking enrollees in federally funded programs and should suffice.

Individual courses may serve as requirements or electives for a number of different programs. As most students do not declare a major until well into their academic careers, course data would be much more reliable than educated guesses at their appropriate six-digit program classification now required.

Some students do not, or are most unwilling to, identify themselves by ethnic, linquistic, handicapped, academic or economic disadvantaged labels, resulting in target populations actually served greatly exceeds reported figures.

Reporting requirements for students in non-degree granting programs of fewer than 60 credit hours are often as great as those for associate degree students.

The student tracking problem is greatly increased by transfer-in and transfer-out students. A simple method is needed for dealing with this.

As postsecondary populations are extremely mobile, student follow-up activities when reported by detailed program area will not yield a response rate sufficient to draw statistically valid conclusions.

We support full accountability for federal program monies, but the VEDS requirements go beyond such accountability. The small federal contribution has been helpful to start new programs and deal with emerging technologies, but we have a desperate need for efficiency and economy of reporting.

Your consideration of these serious concerns will be greatly appreciated at Cape Cod Community College.

Cordially,

James F. Hall
President

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